

APPENDIX

HASP Template
For
EPA Region 10 OSCs

USING THE HASP TEMPLATE

Purpose

This is a template for producing a health and safety plan (HASP) for the EPA employees. 29 CFR 1910.120 (HAZWOPER) requires an employer to develop a “site-specific safety and health plan” or HASP when working at an uncontrolled hazardous waste operation. This template was developed for use by Region 10 On-Scene Coordinators (OSCs) at emergency response or removal sites.

This HASP also serves as the centerpiece for coordinating and consolidating other employer HASPs at a hazardous waste operation.

Background

HAZWOPER requires each employer to develop and implement a HASP for their employees. This requirement is affirmed in the Safety and Health Program (SAHP) for Region 10 OSCs. Accordingly, the OSC must produce a HASP for EPA employees. OSCs should not rely on START or ERRS HASPs to serve as the EPA HASP.

The OSC has the additional responsibility to ensure that safety and health planning is occurring between other site employers. Indeed, the Compliance Guidelines (Appendix C) to HAZWOPER calls for an occupational safety and health program for a site headed by the site coordinator. The Guidelines also calls on each contractor “to have its own program so structure that it will smoothly interface with the program of the site coordinator.”

The challenge is to dovetail the OSC’s authority and responsibility at a site under the NCP with that of each employer under HAZWOPER. The emergency nature of the cleanup work done under the NCP calls for the coordination to occur at the HASP level instead of at a program level. The OSC as the site coordinator can facilitate the “interface” with other employers at a site using this HASP template.

Directions

Instructions are in italics and should be deleted. This template is guidance only and OSCs are encouraged to customize the boilerplate language and format of this template to their preference.

Key Points

- While the OSC may delegate the completion of this HASP, the OSC will remain responsible for the ownership and implementation of its contents.
- The OSC needs to have an active hand in writing the Site History and Scope of Work.
- If other EPA employees (non OSCs) are to perform tasks within an exclusion zone, additional language will be needed under JHA for tasks they will perform, to how they are covered under a PPE and medical surveillance programs, and on applicable health and safety training.
- This HASP is an extension of the SAHP for Region 10 OSCs.
- Other site employers (START, ERRS, PRP, USCG, etc.) are not precluded from producing their own HASP. Indeed, the NCP states that private employers are directly responsible for health and safety of their own employees. As such, they should produce their own HASP. However, the HASPs must “smoothly interface” with the EPA HASP.
- This HASP will incorporate by reference the other employer HASPs to address most of the HASP elements.



HEALTH and SAFETY PLAN
4102 East 11th Street,
Tacoma, Washington
USEPA Site ID #
Project Start Date: March 30, 2012

U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 900; ECL-116
Seattle, WA 98101-1128
Federal On-Scene Coordinator: OSC Andy Smith

Ecology and Environment, Inc.
720 Third Avenue
Suite 1700
Seattle, Washington 98104
206-624-9537

Project Director: Dhroov Shivjani
TDD # 12-03-0007

Environmental Quality Management
6825 216th Street SW
Suite J
Lynnwood, Washington 98036
425-673-2900

Response Manager: Ron McManamy
Task Order # [insert]

Health and Safety Plan Overview

This HASP is required by the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulation (29 CFR 1910.120).

This HASP is incorporated into a written safety and health program (SAHP) as called for under HAZWOPER. The Emergency Management Program at EPA Region 10 has a SAHP for its On-Scene Coordinators (OSC) that meets their obligations under both HAZWOPER and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) regulations (40 CFR 300). While the SAHP incorporates all HASPs, it relies on HASPs to provide the site-specific details not included in the SAHP. As such, this HASP addresses parts of the SAHP as well as the required elements of a HASP as site conditions dictate.

This HASP addresses the elements required in Paragraph (b) (4) (ii) (A – J) of HAZWOPER:

- Safety and health risk or hazard analysis
- Employee training assignments
- Personal protective equipment (PPE)
- Medical surveillance requirements
- Air monitoring, personnel monitoring, and environmental sampling
- Site control measures (addresses Site Control Program of SAHP)
- Decontamination procedures
- Emergency response plan
- Confined space entry procedures
- Spill containment program

This HASP may also address those parts of the SAHP that were deferred such as:

- Organizational structure
- Comprehensive workplan
- Training
- Medical surveillance
- Standard operating procedures
- PPE program
- Site control program (deferred to site control measures above)
- Informational program

This HASP will be kept on site per Paragraph (b)(4)(i) of HAZWOPER.

This HASP consolidates all other employer HASPs by reference to serve as “the site safety and health plan” as required by HAZWOPER. Consolidation includes coordination between employers on common HASP elements and is reflected in the discussion for each of the HASP elements here. Checked boxes below indicate these common elements have been coordinated among the site employers.

<u>Yes</u>	<u>N/A</u>	
<input type="checkbox"/>	<input type="checkbox"/>	Safety and health risk or hazard analysis
<input type="checkbox"/>	<input type="checkbox"/>	Personal protective equipment (PPE)
<input type="checkbox"/>	<input type="checkbox"/>	Air monitoring, personnel monitoring, and environmental sampling
<input type="checkbox"/>	<input type="checkbox"/>	Site control measures (addresses Site Control Program of SAHP)
<input type="checkbox"/>	<input type="checkbox"/>	Decontamination procedures
<input type="checkbox"/>	<input type="checkbox"/>	Emergency response plan
<input type="checkbox"/>	<input type="checkbox"/>	Confined space entry procedures
<input type="checkbox"/>	<input type="checkbox"/>	Spill containment program

Health And Safety Plan Amendment			Amendment No.: <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4	
Site Name:			Amendment Date:	
Describe change(s) to HASP: 				
List additional activities, hazard evaluations, or monitoring activities: 				
The terms set forth in the original HASP (Dated / /) shall remain in effect with the exception of those changes detailed on this form. This amendment is not needed for employer HASP modifications.				
_____ USEPA On-Scene Coordinator			_____ Date	
_____ START Project Manager			_____ Date	
_____ ERRS Response Manager			_____ Date	

Employers acknowledge that:

- | | |
|----------------------------|-----------------------------|
| <u>Andy Smith</u> | <u>March 31, 2012</u> |
| USEPA On-Scene Coordinator | Date |
| <u>Jake Moersen</u> | <u>March 31, 2012</u> |
| START Project Manager | Date |
| <u>Ron McManamy</u> | <u>March 31, 2012</u> |
| ERRS Response Manager | Date |
| <u>Other</u> | <u> </u> |
| | Date |

Site History

OSC Provide Site History

Based upon the information from the Tacoma Fire Department (FD), the building was being used to re-package chemicals for resale. The building caught on fire, possibility due to a chemical reaction during a mixing or packaging process undetermined at this time. Because of the presences of the chemicals the FD strategy was to fire the fire in a defensive mode. Washington Dept. of Ecology (Ecology) responded to the site and called EPA to take the lead if needed. EPA/OSC Andy Smith and START responded with four personnel to the scene on Wednesday, 3/28/12 arriving around 1700 hours. A site perimeter walk around was completed with a FD captain to identify possible hazardous materials and containers. To the southeast of the burn building in an alleyway there is one straight truck reported to have sodium and other reactives stored in it. It was not locked. A second tractor trailer east of the back door of the burn building is present also reported to be used for chemical storage, but is secured. Neither vehicle appeared to have had any fire exposure issues.

Comprehensive Work Plan

OSC Provide

The EPA's SAHP has deferred addressing the comprehensive workplan to the HASP level. This work plan should address the tasks and objectives of the site operations and the logistics and resources required to reach those tasks and objectives.

The following elements of a comprehensive workplan should be addressed [1910.120(b)(3)]:

- address anticipated clean-up activities as well as normal operating procedures which need not repeat any EPA procedures available elsewhere*
- define work tasks and objectives and identify the methods for accomplishing those tasks and objectives*
- establish personnel requirements for implementing the plan*
- provide for the implementation of the required informational programs required in paragraph (i) HAZWOPER*

Further details on comprehensive work plan are provided in each employer's respective HASP.

ORGANIZATIONAL STRUCTURE

This site-specific organizational structure is a continuation of the organizational structure in the SAHP

Organizational Structure			
Name	Site Role	Employer	
Andy Smith	OSC	EPA	
Jake Moersen	START Project Manager	Ecology and Environment	
Ron McManamy	ERRS Response Manager	Environmental Quality, Inc.	
Bryan Baryanchernick	Safety Officer	Environmental Quality, Inc	
Eric Lindeman	Safety Officer	Ecology and Environment	
2 Responders	ERRS	Environmental Quality, Inc	
4 Responders	START	Ecology and Environment	

ROLES AND RESPONSIBILITIES

The following summarizes the roles and responsibilities of those engaged in the health and safety planning and oversight during a hazardous waste operation. The positions and responsibilities defined are not permanent and may be altered or expanded upon to fulfill the operational needs of each unique hazardous waste operation.

EPA OSC: The On-Scene Coordinator (OSC) is the federal official pre-designated by EPA to coordinate and direct responses under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). The OSC will be the incident commander when operating under the Incident Command System (ICS). The OSC is also responsible under the NCP for addressing worker health and safety concerns in accordance with HAZWOPER at a response scene. Under HAZWOPER the OSC is the general supervisor who has responsibility and authority to direct all work operations.

Safety Officer: The SO is the site safety and health supervisor, as called for under HAZWOPER, who is minimally responsible for, and has the authority to develop and implement the HASP and verify compliance. The SO reports to the OSC, which is consistent with the command structure under ICS. The OSC is the SO until the OSC delegates that responsibility

and authority to someone else. The SO has the authority to halt site work if unsafe conditions are detected. Included in the responsibilities of the SO are:

- 1) Managing the safety and health functions for on-site employees.
- 2) Serving as the site point of contact for safety and health matters.
- 3) Ensuring that site monitoring, worker training, and effective selection and use of PPE are being performed.
- 4) Assessing site conditions for unsafe acts and conditions and providing input on corrective action.
- 5) Assisting in the preparation and review of this HASP.
- 6) Maintaining effective site safety and health recordkeeping.
- 7) Coordinating with others as necessary for safety and health efforts.
- 8) *Modify above or add other items as needed*

Field Team Members: Hazardous waste operations personnel are minimally responsible for:

- 1) Taking all reasonable precautions to prevent injury to themselves and to their fellow employees.
- 2) Performing only those tasks that they believe they can do safely and immediately, reporting any accidents and/or unsafe conditions.
- 3) Implementing the procedures set forth in this HASP and their employer's HASP, reporting any deviations from the prescribed procedures prior to beginning work.
- 4) Observing the "Buddy System" during work activities, unless otherwise directed.
- 5) *Modify above or add other items as needed*

SAFETY AND HEALTH JOB HAZARD ANALYSIS (JHA)/SAFE WORK PRACTICES

A JHA form for tasks to be performed by the OSC and other EPA employees is provided on the next page. *(next page, double click to access).*

Further details on JHA are provided in each employer's respective HASP.

A job hazard analysis is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. For each anticipated task, identify the potential uncontrolled hazards and the steps to eliminate or reduce them to an acceptable risk level.

OSCs should request from all participating site employers JHAs for anticipated tasks that may involve the OSC or other site workers to ensure coordination of safety measures on those tasks. This will include tasks that share the same work zone, or require coordination between workers operating under separate HASPs.

Job Hazard Analysis Form					
Task:					
Affiliation:				Date:	
Possible issues: <u>Bodily:</u> Ergonomics Slip/Trip <u>Falls:</u> To the same surface To below <u>Impact:</u> Struck by Struck against	<u>Environmental:</u> Noise Temperature Weather Visibility Ventilation Lighting <u>Toxics:</u> Inhalation Ingestion Absorption Injection	<u>Electrical:</u> Shock Fire Explosion Static/ESD Loss of power Inadvertent activation of equipment <u>Radiation:</u> Ionizing Non-ionizing	<u>Biohazards:</u> Bacteria Viruses Fungi <u>Pressure:</u> Ruptured cylinder Whipping hoses and Lines Water hammer	<u>Mechanical:</u> Caught-in Caught-on Crush Segmental vibration Whole-body vibration Failure Pinching/Rolling	<u>Chemical:</u> Flammable chemicals Explosive reaction Corrosion <u>Other:</u> Adjacent activities Excavation Confined space Communication limitations
Specific Steps	Hazards <i>From checklist above</i>	Abatement Controls <i>(Listing Order)</i> 1) Engineering 2) Work Practice 3) Personal Protective Equipment			
1)					
2)					
3)					
4)					

Created By:	Date:	Approved By:	Date:
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SITE CONTROL MEASURES (SITE CONTROL PROGRAM)

The SAHP defers development of a Site Control Program to the HASP. This Site Control Program has been coordinated among the employers and is concerned with the safety and security of response personnel and others in the area of the emergency response incident. For the purpose of this HASP, the Emergency Response Plan (ERP), which addresses emergencies inside the exclusion zone, is considered an extension of the Site Control Program.

The Site Control Program consists of the following parts of this HASP:

- ERP
- site communications
- the “buddy system”
- the site map
- site work zone map
- map to nearest medical assistance
- any standard operating procedures or safe work practices determined for this site

EMERGENCY RESPONSE PLAN

- 1) *This element of the HASP calls for coordination and agreement among employers as to which employer will respond and which employer will evacuate.*
- 2) *If there is an ERP then discuss which employer will implement it (respond to the emergency in the exclusion zone). The types of emergency can be: release of hazardous waste, toxic gas release, fire, explosion, radiation, or medical. The ERP should address those emergency types that are of greatest concern based on the nature of the cleanup.*
- 3) *Refer to that responsible employer’s HASP for the ERP details.*
- 4) *However, address here those ERP elements that are common to all employers at the site such as emergency recognition, evacuation, places of refuge, alerting procedures to ensure proper coordination.*

The robustness of an ERP needed and the extent to which each element of an ERP needs to be addressed is dependent on the “hardness” of the exclusion zone (Level-A to Level-D PPE).

Elements of the ERP are as follows:

- *Pre-emergency planning.*
- *Personnel roles, lines of authority, training, and communication.*
- *Emergency recognition and prevention.*
- *Safe distances and places of refuge.*
- *Site security and control.*
- *Evacuation routes and procedures.*
- *Decontamination procedures that are not covered by other sections of the site-specific HASP.*
- *Emergency medical treatment and first aid.*
- *Emergency alerting and response procedures.*
- *Critique of response and follow-up.*
- *PPE and emergency equipment.*

The ERP is in the HASP of *[name of responsible employer]*

A hotwash will be conducted with those involved with any emergency response. The meeting will be documented, including any required follow-up actions and assigned responsibilities.

If the OSC or an EPA employee may be responding, then that should be addressed here.

Emergency Response Overview				
Emergency Response Plan for Exclusion Zone [29 CFR 1920.120 (l)]				
Emergency Type	Location(s)	Related Maps	Com. Method	Procedure
<p>Response to a release</p> <p>Response to medical emergency</p>	<p>EZ</p> <p>DZ</p> <p>SZ</p>	<p>M-1</p> <p>M-4</p>	<p>Radio</p> <p>Cell</p>	<p>EZ: Scenario A - <i>The exclusion zone has been characterized and calls for level-B PPE. Entry teams will be closely monitored with standby teams. EQ is responding employer. See EQ HASP for ERP [provide as much information as needed for other employers to understand their roles];</i></p> <p>Scenario B – <i>There is no acute health risk for entering EZ without recommended PPE. Primary function of exclusion zone is to minimize spread of contamination. As such, medical attention to victim has priority and outside medical attention need not be delayed due to exclusion zone. Activate medical notification system. Move victim outside of exclusion zone if safe for victim. [This is the ERP if all employers agree to respond. Everyone should be on the same page and the ERP in this scenario should not be deferred to another employer HASP].</i></p>
Response Plans for Other General Site Emergency Situations				

Weather	Site Wide	M-4	Radio	<p><i>Thunderstorms are common in the PM. If thunder is heard work will stop until half hour after last thunder</i></p> <p><i>Wildfire risk is at extreme. All personnel will evacuate by highway 20 and meet at Hotel California if wildfire threatens the site.</i></p>
Fire or Explosion				<p><i>Exclusion zone contains hazardous waste that is flammable. If fire breaks out all personnel will evacuate EZ. No attempt will be made to suppress the fire.</i></p>
Air Release				
Other				<p><i>Activate Emergency Notification System (9-1-1). three blasts from air horn to evacuate EZ and all personnel to rally at ICP</i></p>
Violence	Site Wide	M-4	Radio Cell	
Auto	Mobilization/ Demobilization	M-1	Cell	

SITE COMMUNICATIONS

Select all modes of communication to be used during the event:

- | | | | |
|-----------------------------------|---------------------------------------|---------------------------------------|---|
| <input type="checkbox"/> Radio | <input type="checkbox"/> Cell phone | <input type="checkbox"/> Hand signals | <input type="checkbox"/> Visual contact |
| <input type="checkbox"/> Air horn | <input type="checkbox"/> Vehicle horn | <input type="checkbox"/> Whistle | <input type="checkbox"/> Other |

Complete the following table summarizing the site communication plan:

Site Communications Overview			
Organization/Agency/Event	Contact Name	Communication Device	Number/Channel/Pattern
Local hospital/clinic	St. Francis Hospital	Cell	253-835-8100
Ambulance	NA	Cell	911
Fire	NA	Cell	
Police	NA	Cell	911
Federal On-Scene Coordinator/Client Contact	Andy Smith	Cell	206-310-7077
EQM Site Health and Safety Officer			
E & E Site Health and Safety Officer	Eric Lindeman	Cell	206-419-3422
Site Workers	All	Radio	Channel 2
Evacuation	All	Air Horn	Three short blasts
Level A/B PPE	Team A	In-Ear radio	Voice activated
Confined Space Entry	Team A	Visual contact	Hand Signals

Further details on communication are provided in each employer's respective HASP.

BUDDY SYSTEM

A buddy system organizes the workers to monitor each other for health and safety accountability. The strictness of buddy system to be used needs to be discussed in context to the site, task, and hazards. Buddy system could range from radio check-in every half hour to two people together at all times.

Further details on buddy system are provided in each employer's respective HASP.

Buddy System Overview		
Employer	Task	Description
EPA	Oversight	OSC Smith will buddy with either ERRS or START as needed based upon the tasked being completed
Ecology and Environment, Inc./ On-Site START	START Technical Assistance	START will buddy with other START or with ERRS under the supervision of their respective SSO.
Environmental Quality Management/ERRS	ERRS Support	ERRS will buddy with other ERRS or START under the supervision of their respective SSO.
Other Agencies	Inspection/site visit	All visitors other than EPA/START/ERRS will check in with the OSC and be assigned an escort as needed. The public is restricted from the site.

PPE

This section addresses PPE to be used by EPA employees for each of the site tasks and operations being conducted.

PPE is selected after first considering engineering controls then administrative controls or combination of all three as means of hazard controls.

OSCs operate under a PPE program found in the SAHP. This element of the HASP is an extension of the PPE program.

If a task the OSC performs at this site requires him or her to wear a respirator, it is noted that the OSC is enrolled in a respiratory protection program, a subset of the PPE program, and is fit-tested annually in accordance with 29 CFR 1910.134(f).

PPE requirements for EPA employees are addressed in the applicable JHAs. See the JHA for further information.

EPA PPE Requirements		
Task	Level of Protection	Description
Oversight Inspection	Level-D	On this site the OSC is not expected to need a level of protection above level D of hard Hat, eye protection, steel-toed boots, safety vest, trousers, hearing protection as needed. Some level of rain protection will be needed.
Contractors on-site	Level D to (C)	The level of protection that the contractors will need to provide is addressed in their individual HASP. Each contractor will have their individual corporate PPE and Respiratory Program that will be followed by their employees. Any discrepancies will be corrected based upon site conditions, tasks to be completed, and cooperation between the respective SSO and the OSC during the daily safety briefing. The final agreed upon level of PPE will be documented in the individual contractor HASP's as is appropriate. All contractors on-site understand that the OSC has final discretion in addressing the level of PPE/Protection, but each SSO will provide technical assistance to confirm that all applicable H & S regulations and best practices are being met.

As an extension of the PPE Program, tailgate safety briefings will address the following elements as needed:

- how to select proper PPE based upon site hazards
- use and limitation
- work mission duration

- maintenance and storage
- decontamination and disposal
- proper fitting
- donning and doffing procedures
- inspection procedures (prior to, during, and after use)
- limitations during temperature extremes
- appropriate medical considerations including heat stress

Further details on PPE are provided in each employer's respective HASP.

DECONTAMINATION PROCEDURES

Employers have coordinated on common decontamination procedures which have been addressed in accordance with paragraph (k) of HAZWOPER and are provided here. Employers with tasks and PPE that call for different decontamination procedures have addressed those procedures in their respective HASP.

EPA employees will follow the common decontamination procedures. Otherwise, EPA employees will follow decontamination procedures of other employer as warranted by task and PPE.

It is important for employers to coordinate on this section. The nature of site, tasks to be performed, and level of PPE will dictate how much of the decontamination procedures should be discussed here and how much should be deferred to employer HASP. Generally, tasks with higher level PPE being performed by one employer should be addressed in that employer's HASP

Common decontamination procedures:.

Decontamination Overview				
Employer	Item/Worker	Related Map #	# of Steps	Description/Steps
All	Level D Worker	Site Map TBD/updated based on site conditions and activity.	1	Workers will exit site through decontamination corridor doing self- decontamination using dry decon protocols. Water will be available for emergency decon.

PERSONNEL MONITORING

The following is a summary of the action levels to be adhered to by EPA employees. *EPA/Tech Law/E&E* is tasked with maintaining and calibrating monitoring equipment while on site as well as conducting the monitoring unless otherwise indicated.

The frequency and types of air and personnel monitoring and instrumentation to be used, including methods of maintenance and calibration of monitoring and sampling equipment to be used will be addressed in each respective employer's HASP.

MINIMUM CONTAMINANT ACTION LEVELS				
Hazard	Monitoring Equipment*	Employer Assigned	Action Level	Action
Explosive atmosphere	MultiRae multiple gas monitor with explosimeter	START	< 10 % LEL 10–25 % LEL > 25 % LEL	Continue work Continue with caution Leave area
Oxygen	MultiRae multiple gas monitor with oxygen sensor	START	< 19.5 % O ₂ 19.5-23.5 % O ₂ > 23.5 % O ₂	Leave area Continue work Leave area
Unknown organic vapors	PID for Organic vapor monitoring in breathing zone, 5 minute averages		<1 unit above background 1-5 units above background 5-500 units above background	Level D Upgrade to Level C Upgrade to Level B
Specific chemicals/classes	Toxic gas monitor; colorimetric tubes		½ of lowest suggested limit: If alarm activates:	Upgrade to Level C Leave area
Particulates	Particulate monitor	TBD START	> 2.5 mg/m ³	Upgrade to Level C or implement engineering controls
Radiation	Radiation alert monitor Micro R meter		> 0.1 mR/hr 3x background to 1 mR/hr > 1 mR/hr	Leave; use micro R meter Work with caution Leave; consult H/S
Other:				

*Unless otherwise noted, these instruments were maintained and calibrated by contractors at the EPA warehouse.

MONITORING SCHEDULE				
Task	Monitoring Equipment	Upon Entry or Continuous	Periodic	Perimeter
Site entry	TBD	X		
Documentation	Not needed based upon earlier entries	X		
Air Monitoring	4-gas/PID			
Sampling	DATA Ram		X	
Decontamination				

PERMIT-REQUIRED CONFINED SPACE (PRCS) ENTRY

Applicability

A confined space has limited openings for entry or exit, is large enough for entering and working, and is not designed for continuous worker occupancy.

Permit-required confined spaces are confined spaces that:

- May contain a hazardous or potentially hazardous atmosphere.
- May contain a material which can engulf an entrant.
- May contain walls that converge inward or floors that slope downward and taper into a smaller area which could trap or asphyxiate an entrant.
- May contain other serious physical hazards such as unguarded machines or exposed live wires.
- Must be identified by the employer who must inform exposed employees of the existence and location of such spaces and their hazards.

The OSC and other employers have determined through JHA that:

- ☐ there are no tasks at this site that involve entry into a PRCS
- ☐ there are tasks at this site that involve entry into a PRCS

Host Employer - The OSC and other employers have determined that the host employers with responsibilities specified in Section [29 CFR 1910.146\(c\)\(8\)](#) of the OSHA PRCS standard are:

- ☐ EPA
- ☐ *[If applicable, the name of PRP arranging contractor doing the task involving PRCS entry]*

Confined Space Entry Procedures for EPA - The OSC has determined that:

- ☐ No EPA employee will do PRCS entry
- ☐ EPA employees may do PRCS entry. The confined space entry procedures for EPA employees will be the site-specific PRCS procedures set out by the controlling employer. The OSC has reviewed those procedures and has deemed them acceptable for EPA use. As such, the OSC has adopted the PRCS procedures to this HASP and can be found in the HASP of the controlling employer.

Controlling Employer - The controlling employer with operational control over the PRCS is:

[Provide name of employer that has operational control over the PRCS]

The controlling employer conducting the PRCS entry will address the PRCS requirements pursuant to 29 CFR 1910.146 in their employer HASP. Other employers on site will adhere to the entry procedures developed by the principal employer conducting PRCS entry.

All employers who have employees doing tasks in the PRCS:

- are responsible for developing and implementing procedures to coordinate entry operations
- retain responsibility for the protection of their own employees
- have agreed to the PRCS controlling employer

The OSC Training Program includes Confined Space Awareness training. Region 10 has a draft Confined Space Safety Program.

SPILL PREVENTION AND RESPONSE

A spill containment program, meeting the requirements of paragraph (j) of HAZWOPER, is addressed in HASP of the employer tasked with performing the clean-up.

EMPLOYEE TRAINING ASSIGNMENT

The OSC is trained to the level of responsibility as required in paragraph (e) of 29 CFR 1910.120 and is current in HAZWOPER training and medical surveillance. In addition, the OSC has had the management and supervisory training required in paragraph (e). OSC training covers decontamination procedures, emergency response plans, confined space entry, and spilled containment procedures, the four key discussion elements in this HASP. The OSC Safety and Health Training Program can be found in the SAHP.

All EPA employees engaged in field activities are required to meet EPA Order 1440.2, *Health and Safety Requirements for Employees Engaged in Field Activities*. No EPA employee will be allowed in the exclusion zone that has not completed the requisite training under HAZWOPER.

A pre-entry briefing (tailgate safety briefing) as required by Paragraph (b) (4) (iii) of HAZWOPER will be held at the start of each operational period and is considered part of the OSC Employee Training Program.

Other onsite employers will address their employee training assignments in their respective site specific HASP.

MEDICAL SURVEILLANCE

The OSC is enrolled in a medical surveillance program and has been medically cleared to work in uncontrolled hazardous waste operations and if necessary wear respirators (Level A-C). The Medical Surveillance Program is discussed in the SAHP.

Medical surveillance requirements for non- EPA employees are addressed in their employer's HASP. Medical surveillance clearance records will be kept on site or be produced within 24-hours of any request.

Medical surveillance requirements do not apply to workers who work in the support zone.

MAPS

Attached are the following separate maps: *(check as needed)*

Site Specific Maps Included			
<input type="checkbox"/> Hospital Route (M-1)	<input type="checkbox"/> Site Map (M-2)	<input type="checkbox"/> Work Zones (M-3)	<input type="checkbox"/> Emergency Response (M-4)
<input type="checkbox"/> Decontamination Step Locations (M-5)	<input type="checkbox"/> Environmental Monitoring (M-6)	<input type="checkbox"/> Other (M-X)	<input type="checkbox"/> Other (M-X)



[Insert maps. Copies should be prominently displayed]

HASP ACKNOWLEDGEMENT AND PRE-ENTRY BRIEFING

A pre-entry briefing is required by HAZWOPER at 29 CFR 1910.120(b) (4) (iii). The following EPA employees have received a pre-entry briefing and understand the requirements and procedures of this HASP.

_____ Signature	_____
_____ Print Name	_____ Date
_____ Signature	_____
_____ Print Name	_____ Date
_____ Signature	_____
_____ Print Name	_____ Date
_____ Signature	_____
_____ Print Name	_____ Date
_____ Signature	_____
_____ Print Name	_____ Date
_____ Signature	_____
_____ Print Name	_____ Date